



Lourdes M. Rosado  
President and General Counsel

**MEMO ENDORSED**

September 8, 2023

The Honorable Jessica G. L. Clarke  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Via Electronic Filing**

Re: SeanPaul Reyes v. City of New York, 23-cv-06369

Your Honor,

Plaintiff's counsel writes pursuant to Individual Practice 2(e) to request an extension of the deadline to file the reply in support of the motion for a preliminary injunction from **September 15, 2023** to **September 21, 2023**. Plaintiff's counsel has a hearing in Austin, Texas on September 13 in another matter, *Thoele et al. v. Hinojosa et al.*, Cause No. D-1-GN-22-006192 (Travis County) and has been preparing for that hearing.

Plaintiff's counsel has conferred with Defendant's counsel, who consents to this extension. This is the first extension that Plaintiff has requested in this matter. The parties' next scheduled appearance in this matter is the hearing on the preliminary injunction set for **September 28, 2023**, which is one week after the proposed new deadline for filing the reply brief.

Respectfully Submitted,

Andrew Case  
LatinoJustice PRLDEF

Dated: September 8, 2023  
New York, New York

SO ORDERED.

JESSICA G. L. CLARKE  
United States District Judge

**NEW YORK OFFICE** | 475 Riverside Drive, Suite 1901 New York, NY 10115 | D: 212.219.3360 G: 800.328.2322

**SOUTHEAST REGIONAL OFFICE** | 523 West Colonial Drive Orlando, FL 32804 | D: 321.250.2853

**SOUTHWEST REGIONAL OFFICE** | 611 South Congress Ave STE: 450D Congress Square II Austin, TX 78704 | D: 512-649-9129

[latinojustice.org](http://latinojustice.org)

